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BY ECF

HONORABLE RAYMOND J. DEARIE
U. S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: United States v. Bebars Baslan
Docket No. 13 CR 220 (RJD)**

Dear Judge Dearie:

I respectfully ask for a 3 week extension of time to file defendant Baslan's Rule 29/33 motions, which are presently due August 25th. I did not expect to ask for more time at our recent status conference. There is a confluence of reasons for this request, both personal and case related.

The present sentencing schedule will not be affected should the Court grant my motion. But I have and am facing certain issues personally that I must address in the next several weeks. I cannot possibly defer dealing with those matters without long term adverse consequences.

The issues to be raised will require substantial legal research, particularly as to the Constitutionally of the interstate travel act underlying count one, which carries a 30- year mandatory minimum. In addition, among other subjects to be contested in his post-trial motions, Mr. Baslan raises serious issues regarding certain computer files, for which he asked prior to trial, that would have demonstrated that the witness Steven perjured himself in material respects during his trial testimony.

The government, by AUSA's Tyler Smith and Tiana Demas, has no objection to the requested schedule change.

I thank Your Honor for your courtesy and consideration.

Respectfully submitted,

_____/S/_____
Ephraim Savitt, Esq.

Cc By ECF:

Clerk of the Court (RJD)
AUSA Tyler Smith
AUSA Tiana Demas